

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

CHRISTOPHER IRWIN,

Plaintiff,

vs.

C.A. No. CA04-246 Erie  
District Judge McLaughlin  
Magistrate Judge Baxter

NURSE 1, NURSE 2, NURSE 3, WARDEN  
WASHINGTON COUNTY  
CORRECTIONAL FACILITY,  
PATROLMAN RON RAYMOND,  
CHARTIERS TOWNSHIP POLICE  
DEPARTMENT,

Defendants.

**MOTION FOR LEAVE OF COURT TO DEPOSE PLAINTIFF**

AND NOW COMES the Defendants, by and through their counsel, Law Office of Joseph S. Weimer and Edmond R. Joyal, Jr., Esquire, and hereby moves this Honorable Court pursuant to F. R. C. P 30 (a) (2) grant them leave to depose Plaintiff who is currently in prison.

1. Plaintiff Christopher Irwin initiated this suit by filing a Complaint in the United States district Court for the Western District of Pennsylvania at No. CA04-246E.

2. Plaintiff alleges that his 5<sup>th</sup> Amendment Right was violated and he was deprived of medical treatment.

3. Plaintiff is currently incarcerated at SCI Albion, Erie County, Pennsylvania.

4. The Defendants need to depose the Plaintiff in order to properly prepare a defense in this case.

WHEREFORE, Defendants, request an Order allowing the deposition of Plaintiff Christopher Irwin as required by F. R. C. P. 30 (a)(2).

LAW OFFICE OF JOSEPH S. WEIMER

BY: s/Edmond R. Joyal, Jr.  
Edmond R. Joyal, Jr., Esquire  
Pa. I.D. #65907  
Attorney for Defendants

Law Office of Joseph S. Weimer  
975 Two Chatham Center  
Pittsburgh, PA 15219  
(412) 338-3184

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing MOTION FOR  
LEAVE OF COURT TO DEPOSE PLAINTIFF has been served by First Class Mail, postage  
pre-paid, upon the following parties on this 25<sup>th</sup> day of May, 2006.

Christopher Irwin  
SCI Albion  
10745 Route 18  
Albion, PA 16475  
*(Pro Se Plaintiff)*

LAW OFFICE OF JOSEPH S. WEIMER

BY: s/Edmond R. Joyal, Jr.  
Edmond R. Joyal, Jr., Esquire  
Pa. I.D. #65907  
Attorney for Defendants

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